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C. REMARKS

Status of the Claims

Claims 1-21 are currently present in the Application, and claims 1, 9, 13, and 21 are independent claims. Claims 1-20 have been previously presented in the response filed on January 12, 2005. Claim 21 is a new independent claim that has been added in this Supplemental Response. No claims have been amended or canceled in this Supplemental Response. Consideration and examination of new claim 21, and remarks thereto, is respectfully requested in addition to reconsideration of Applicant's amended claims and remarks thereto filed January 12, 2005.

Drawings

The Office Action did not indicate whether the formal drawings filed by the Applicant are accepted by the Examiner. Applicant respectfully requests that the Examiner indicate whether the drawings filed on March 26, 2001 are accepted by the Examiner in the next communication.

Claim Rejections - Alleged Anticipation Under 35 U.S.C. § 102
And Alleged Obviousness Under 35 U.S.C. § 103

Rejection of claims 1-3, 9, and 12-15 as being anticipated under 35 U.S.C. § 102(e) by Lewis, U.S. Patent No. 6,779,720, and claims 4-8, 10-11, and 16-20 as being obvious, and therefore unpatentable over Lewis were previously traversed in Applicant's Response filed January 12, 2005. In this Supplemental Response, Applicant focuses on the patentability of new claim 21 over the cited reference.

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New claim 21

Applicant has added new claim 21 which is directed to a method of managing customer security features by a security server. New claim 21 includes many of the limitations previously found in original claims 1, 4, 5, and 6.

Limitations of Applicant's original claim 1, which have been included in new claim 21, were originally rejected using the Lewis reference. In Applicant's Response filed January 12, 2005, Applicant filed a declaration, pursuant to 37 C.F.R. § 1.131, by Applicant Rabindranath Dutta, that removed the Lewis reference as prior art. Therefore, Applicant respectfully submits that new claim 21 is allowable for at least the reason that Lewis is not prior art and the limitations originally found in Applicant's claims 1 are allowable to the extent such limitations have been incorporated into claim 21.

Notwithstanding the allowability of claim 21 as described above, Applicant respectfully submits that Lewis simply does not teach or suggest the limitations set forth in new, independent claim 21.

As discussed in detail in Applicant's response of January 12, 2005, the Examiner admits that Lewis does not disclose many, and in some cases all, of the elements found in original claims 4-8, 10-11, and 16-20. The Examiner merely asserts that "an authentication server acting as a proxy or agent to provide authentication service (e.g. receiving authorization, storing authorization and authenticating the receiver before secure information is released) is old and well known" (see Office Action, page 4, lines 19-21; page 5, lines 9-11; and page 6, lines 7-8). The Examiner also asserts that "using public key system (sic) for authentication is old and well known" (see Office Action, page 5, lines 15-16). The Examiner further

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asserts that "updating secure information (e.g. merchant has changed public key) from a user to the authentication server is old and well known" (see Office Action, page 6, lines 12-13). There is no support for these assertions that elements of Applicant's claims are "old and well known."

Applicant further asserts that the Examiner has not met the burden of MPEP § 2143.01 because the Examiner has not shown any motivation to modify the teachings of the prior art to produce the claimed invention. The Examiner has not provided any motivation to modify the Lewis patent, either in Lewis itself, or in the Examiner's hypothetical "old and well known" prior art. Rather, the Examiner appears to be using Applicant's claims as guideposts in the examination of Applicant's claims. Therefore, the Examiner is using impermissible hindsight in combining the Lewis patent with Examiner's "hypothetical well known prior art."

Even assuming, for the sake of argument, that authentication servers, public key systems, and updating secure information is old and well-known (assertions with which Applicant does not agree), the Examiner has not shown, or even asserted, that it is well-known to use these elements in the manner claimed by Applicant.

Conclusion

As a result of the foregoing, it is asserted by Applicant that the remaining claims in the Application are in condition for allowance, and Applicant respectfully requests an early allowance of such claims.

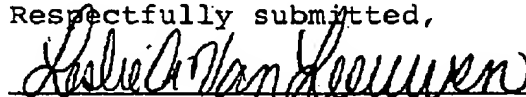
Applicant respectfully request that the Examiner contact the Applicant's attorney listed below if the Examiner believes

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that such a discussion would be helpful in resolving any remaining questions or issues related to this Application.

Respectfully submitted,

By



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